

EXHIBIT "B"

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

RICHARD R. CAPOZZA AND ANN M.
CAPOZZA,

Plaintiffs,

-vs-

Civil Action No.: 5:20-CV-0406 (TJM/TWD)

THE AUTOMOBILE INSURANCE
COMPANY OF HARTFORD, CONNECTICUT,

Defendant.

AFFIRMATION OF MEG R. REID

STATE OF CONNECTICUT)
) SS.:
COUNTY OF HARTFORD)

I, Meg Reid, being duly sworn, deposes and says:

1. I am an attorney with the law firm of Keane and Associates, attorneys for Defendant, The Automobile Insurance Company of Hartford, Connecticut (“Travelers”). As such, I am familiar with all prior proceedings had herein. I make this affirmation of my own personal knowledge and/or based upon a review of the records made available to me in the handling of this litigation.

2. Travelers submits this affidavit in support of its Notice of Removal of this matter from the Supreme Court of the State of New York, Onondaga County to the United States District Court for the Northern District of New York.

3. In filing its Notice of Removal, consistent with rules of this Court and the rules of the State of New York, Travelers prepared a Notice of Notice of Removal to be filed with the Clerk of Court, Supreme Court of the State of New York, Onondaga County, wherein Travelers notifies

the Supreme Court of the State of New York that it has duly filed a Notice of Removal with this Court. The Notice of Notice of Removal is attached hereto as **Exhibit 1**.

4. However, on March 22, 2020, pursuant to Administrative Order 78-2020, Chief Administrative Judge of Courts for the State of New York, the Honorable Lawrence K. Marks, directed that, effective immediately and until further order, “no papers shall be accepted for filing by a county clerk or a court in any matter of a type not included on the list of essential matters.” Administrative Order 78-2020 is attached hereto as **Exhibit 2**.

5. Removal of a matter from state court to federal court including related filings is not an “essential matter” under Administrative Order 78-2020.

6. Pursuant to and in compliance with Administrative Order 78-2020, Travelers cannot file its Notice of Notice of Removal with the Clerk of Court, Supreme Court of the State of New York, Onondaga County.

7. Travelers is simultaneously filing the Notice of Notice of Removal on Plaintiffs.

8. When Administrative Order 78-2020 is lifted, expires, or is otherwise amended so as to permit the filing of the Notice of Notice of Removal, Travelers will promptly comply with all filing obligations.

9. Travelers informed counsel for Plaintiff by telephone of Travelers’ intent to remove this matter to the United States District Court for the Northern District of New York. Counsel for Plaintiffs did not object to Travelers’ proposed course to serve but not file the Notice of Notice of Removal due to the restrictions contained in Administrative Order 78-2020.



Meg Reid